



IFM Group Vendor / Supplier / Business Partner Privacy Notice

IFM Investors Pty Ltd (“IFM Investors”) and its subsidiaries, branches, local employing entities, associates, and affiliated companies (hereafter “IFM Group”, “IFM”, “us,” “our”, or “we”) are committed to protecting and securing the privacy and confidentiality of your Personal Data¹, where IFM chooses to enter into a business engagement with a vendor/supplier/business partner. This notice (the “Notice”) outlines and explains how IFM will process² your Personal Data in accordance with applicable privacy legislation(s).

Contact details

IFM is the controller for the Personal Data we process unless otherwise stated.

You can contact us by either email or post.

Our postal address for Australia is:

Attn: Privacy Officer
Address: Level 33, 50 Lonsdale Street
Melbourne VIC 3000
Australia

The postal addresses for all IFM office locations can be found [here](#).

Alternatively, you can contact us via email at dataprotection@ifminvestors.com.

What does this Notice cover?

This Notice aims to provide vendors/suppliers/business partners (together “you”) with information on what Personal Data we may collect and process about you, why and how we process your Personal Data, including details on the privacy principles we will abide by, and inform you of certain rights you may be able to exercise on your Personal Data.

What Personal Data do we collect?

During our business interactions, depending on the relevant circumstances, the nature of the products/services sought from you and applicable local laws and requirements, we may collect some or all of the information listed below.

Categories of Personal Data	Examples
Personal details	Name; email address; phone numbers; date of birth; identification data; and signature.
Business Financial Information	Bank account or Card details insofar IFM’s vendor/supplier/business partner is a natural person.
Other details	Background check details related to the vendor/supplier/business partner and their directorship information (if applicable); organisation name; and job title.

How do we collect your Personal Data?

We may collect your Personal Data primarily through direct interactions with you or an authorised delegate, including by inquiring about, applying for, using, or otherwise engaging in our products or services, or conducting

¹ ‘Personal Data’ means any information about you from which you can be identified (whether derived from that information on its own or when combined with other information that we or another party may hold about you).

² Processing means any activity or set of activities which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



business with us. This typically occurs before our formal business relationship begins, often prior to or during the official business interactions. Additionally, if we reach out to you for a specific request, we may ask you to provide certain information. This process may involve entering into an official contract with us, at which point we will require specific details to ensure compliance with our operational needs and legal obligations. Throughout this process, we prioritise transparency and security, ensuring that your Personal Data is collected and handled responsibly.

How we use your Personal Data?

We may collect and use your Personal Data for the purposes including, but not limited to, as set out below:

- to manage our relationship with our vendors/suppliers/business partners;
- to make decisions about procuring goods and services (e.g., determining payment or the terms of our contractual agreement(s), etc.);
- to uphold our company's economic interests and ensuring compliance and reporting (such as adhering to our policies and local legislation and managing allegations of fraud or misconduct);
- to make decisions relating to investigations and other disciplinary action;
- to correspond with you (including with Generative Artificial Intelligence), for example, to manage our relationship with you;
- to keep you informed of news, updates, and other information relating to our business and other related companies in the IFM; and
- to comply, or for our affiliates (including other IFM members and subsidiaries) to comply, with applicable legal or regulatory requirements.

Why we process your Personal Data?

We process your Personal Data for specified purposes and on the following legal grounds for the various situations that may arise during our business engagement:

- We process Personal Data related to representatives or contacts of our vendors, suppliers, and business partners for our legitimate interest to communicate in a standard, personalised manner.
- We use Personal Data to manage communications and evaluate the status of our business relationships, which is necessary for the performance of contracts.
- For legal entities, we utilise Personal Data to keep them informed throughout our relationship, while for individuals, we use it to investigate and prevent fraud or misconduct, safeguarding our economic interests.
- We ensure that you receive relevant information regarding our services as part of our legitimate interests.
- Where required by local law, we will seek your consent before processing your data for informational purposes.
- Our data processing is necessary to comply with the legal obligations to which we are subject.

With whom we share/disclose your Personal Data

We may share/disclose your Personal Data with any of the following third parties:

- **IFM:** We may share your Personal Data with applicable IFM employees. This may include members of the finance team, procurement team, respective business teams (as part of managing the relationship) and, if necessary, the IT team responsible for managing system access. Access to your data is strictly limited to those individuals who require it for their specific roles in our business engagement processes.
- **Our service providers:** We may share Personal Data with our service providers who assist us in performing our functions and services. These service providers may include organisations that provide insurance and insurance broking, personnel, archival, mail and delivery, auditing, professional advisory



(financial, legal, tax and management consulting), banking, security or technology services that may also support Generative Artificial Intelligence.

- **Other parties as part of a corporate transaction:** We may share your Personal Data with prospective purchasers and their advisers where we are discussing selling or transferring part, or all, of an IFM entity to them, but only so they can evaluate the relevant business. If we are restructured or sold to another organisation, we may transfer information we hold about you to them so they can continue to provide services to you.
- **Third parties:** We may disclose your Personal Data to third parties when we reasonably believe we are required by law and in order to investigate, prevent, or take action regarding suspected or actual unlawful or otherwise prohibited activities, including, but not limited to fraud.
- **Regulators or other authorities:** We may share your Personal Data in order to comply with our legal and regulatory obligations, such as with regulators, when, in our reasonable opinion, the law or other regulation requires us to share this data. We may also share your Personal Data where we think this is necessary, for example, to meet our legitimate interests and protect our business, including from fraud and legal claims.

Is your Personal Data transferred across international borders?

We may transfer your Personal Data to IFM offices and authorised third parties located outside of your country and take organisational, contractual and legal measures to ensure that your Personal Data are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented to safeguard your Personal Data. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your Personal Data from your habitual place of residence to countries that do not offer adequate protections, then we will ensure that appropriate safeguards, as required by applicable laws, are put in place prior to the transfer of the data, for example, incorporating standard contractual clauses or data transfer agreement(s) established between the parties transferring the Personal Data. Further details of these transfers are available from us on request.

How long do we retain your Personal Data?

We will take reasonable steps to keep your Personal Data for as long as is necessary to fulfil the purpose for which it was collected, subject to any legal obligation to retain Personal Data for a prescribed period of time as specified in our Records Retention Schedule.

When determining the length of time, we take into account factors such as our legal or regulatory responsibilities, including complying with any required retention periods and limitation periods relevant to legal action. For example, we may need to retain certain of your Personal Data until any legal claims under the contract expire unless an overriding legal or regulatory obligation arises.

How do we safeguard your Personal Data?

We implement and maintain appropriate technical, organisational, and physical security measures to protect your Personal Data that aligns with key cyber security requirements from certain leading standards (such as the National Institute of Standards and Technology and the International Organisation for Standardization).

These may include, but are not limited to, the following:

- Access to Personal Data is based on the need-to-know and least privilege principle to ensure the Personal Data is only accessible to authorised individuals for the performance of their duties.
- Layered security controls ranging from perimeter security to end user machine level controls such as firewalls, spam protection, antivirus and spyware solutions, security awareness training, and incident management are applied.



- To further reduce the risk associated with processing the Personal Data, we make use of techniques to make your Personal Data anonymous where possible.
- We use encryption mechanisms, where appropriate, such as email encryption, encryption of Personal Data during transfer, secure VPN access, and disk-level encryption.
- Third parties that process Personal Data on our behalf do so according to our written instructions. They are bound by confidentiality and must implement suitable technical and organisational measures to ensure the Personal Data is secured.

What if you do not provide Personal Data?

Depending on the type of Personal data in question and the grounds on which we may be processing it, should you decline to provide us with such Personal data, we may not be able to fulfil our obligations as they relate to maintaining a relationship with you and other applicable laws and regulations with respect to your contract. If you have concerns about providing certain data, please reach out to us to discuss if there are any potential alternative options which may be available.

Your rights in relation to your Personal Data?

You have certain rights in relation to the Personal Data IFM holds about you. These rights vary depending on the country where you are based. Further information about your rights, and how you can exercise them, is provided in this [Addendum 1](#).

Who can you contact if you have a query, concern, or complaint about your Personal Data?

If you have any issues, queries or complaints regarding the processing of your Personal Data, please contact us at dataprotection@ifminvestors.com. For more details, please refer to the section 'Contact Details' above. If you are unsatisfied with the handling of your Personal Data by IFM, please refer to [Addendum 2](#) for the Country/State specific supervisory authority list.

Information about IFM's Privacy Statement is available [here](#).

How do we update this Notice?

This Privacy Notice was last updated on 11 April 2025.